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JOSEPH MORREY and BETH MORREY,)	
individually and on)	
behalf of all others similarly situated,)	
)	Case No. 2:15-cv-4208-NKL
Plaintiff,)	
)	<u>Jury Trial Demanded</u>
v.)	
)	
VOLKSWAGEN GROUP OF AMERICA,)	
INC., a New Jersey Corporation,)	
)	
Defendants.)	
)	

1. Defendant Volkswagen Group of America, Inc. (“VWGoA”) hereby moves, by counsel: (1) to stay all proceedings in this case pending the outcome of the Judicial Panel on Multidistrict Litigation’s (the “JPML”) decision on the pending motions for transfer of related actions based on common questions of fact as those contained in Plaintiffs’ Complaint in *In re: Volkswagen “Clean Diesel” Marketing, Sales Practices, and Products Liability Litigation*, MDL No. 2672; and (2) for an enlargement of time for VWGoA to respond to Plaintiffs’ Class Action Petition, to run until such time as the Court orders, following the outcome of the JPML decision on the pending motions.

2. Plaintiffs Joseph Morrey and Beth Morrey, by their counsel, have authorized VWGoA to state that they do not oppose this Motion, and agree that a stay of proceedings and enlargement of VWGoA's answer time, as requested, are appropriate.

3. Defendant respectfully directs the Court's attention to the accompanying Suggestions in Support of this Motion.

Dated: October 15, 2015

Respectfully submitted,

/s/ John W. Cowden

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America, Inc.**

CERTIFICATE OF SERVICE

I hereby certify that, on October 15, 2015, a true and correct copy of the foregoing was served upon the following via U.S. mail, postage prepaid, and has been electronically filed using the Court's CM/ECF system:

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/s/ David M. Eisenberg
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